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8 *Attorneys for Complainant*

9
10 **BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA**

12 **WILLIAM PRASIFKA,**
Executive Director,
13 Medical Board of California,
Department of Consumer Affairs,
14 State of California,

Petitioner,

15 v.

16 **ROMEO N. RODRIGUEZ, M.D.**
29151 Willowood Ln.
17 Highland, CA 92346-5403
18 Physician's and Surgeon's Certificate No.
19 A 31849

20 Respondent.

Case No. 800-2022-086118

**STIPULATION OF THE PARTIES RE
INTERIM ORDER OF SUSPENSION
AND ORDER**

21
22 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
23 entitled proceedings that the following matters are true:

24 **PARTIES**

25 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of
26 California (Board). He brought this action solely in his official capacity and is represented in this
27 matter by Rob Bonta, Attorney General of the State of California, by Karolyn M. Westfall,
28 Deputy Attorney General.

1 (d) To present oral argument.

2 10. Having the benefit of counsel, Respondent hereby knowingly, intelligently, freely
3 and voluntarily waives and gives up each and every one of the rights set forth and/or referenced in
4 paragraph 9, above.

5 11. Respondent is fully aware of all of his rights under Government Code section
6 11529, subdivisions (f) and (g), which state as follows:

7 “(f) In all cases where an interim order is issued, and an accusation is
8 not filed and served pursuant to Sections 11503 and 11505 within 15 days of the
9 date in which the parties to the hearing on the interim order have submitted the
10 matter, the order shall be dissolved. Upon service of the accusation the licensee
11 shall have, in addition to the rights granted by this section, all of the rights and
12 privileges available as specified in this chapter. If the licensee requests a hearing
13 on the accusation, the board shall provide the licensee with a hearing within 30
14 days of the request, unless the licensee stipulates to a later hearing, and a decision
15 within 15 days of the date the decision is received from the administrative law
16 judge, or the board shall nullify the interim order previously issued, unless good
17 cause can be shown by the Division of Medical Quality for a delay.

18 “(g) Where an interim order is issued, a written decision shall be
19 prepared within 15 days of the hearing, by the administrative law judge, including
20 findings of fact and a conclusion articulating the connection between the evidence
21 produced at the hearing and the decision reached.”

22 12. Having the benefit of counsel, Respondent hereby knowingly, intelligently, freely
23 and voluntarily waives and gives up each and every the of the rights set forth and/or referenced in
24 paragraph 11, above.

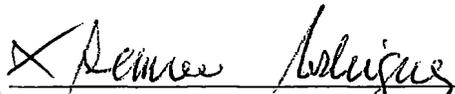
25 13. Respondent hereby specifically, knowingly, intelligently, freely and voluntarily
26 waives and gives up his right to the expedited filing of an accusation, an expedited hearing on the
27 accusation, and an expedited issuance of a proposed decision, all of which he is entitled to under
28 Government Code section 11529, subdivisions (f) and (g).

ADDITIONAL PROVISIONS

14. The parties hereby stipulate that all proceedings in the above-entitled Interim Order of Suspension matter shall be conducted at the Office of Administrative Hearings located in San Diego, California.

15. The parties further stipulate that copies of this "Stipulation of the Parties Re Interim Order of Suspension and Order," including copies of signatures appearing thereon, may be used in lieu of original documents and signatures and, further, that such copies and signatures shall have the same force and effect as originals.

Dated: October 4th, 2022


ROMEO N. RODRIGUEZ, M.D.
Respondent

Dated: October 6th, 2022


GREGORY H. KASSEL, ESQ. 1368
Counsel for Respondent

Dated: October 10, 2022

ROB BONTA
Attorney General of the State of California
ALEXANDRA M ALVAREZ
Supervising Deputy Attorney General



By KAROLYN M. WESTFALL
Deputy Attorney General
Attorneys for Petitioner

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INTERIM ORDER OF SUSPENSION

Based on the foregoing stipulations and agreements, an Interim Order of Suspension is hereby issued immediately suspending Physician's and Surgeon's Certificate No. A31849 heretofore issued by the Medical Board of California to Respondent Romeo Rodriguez, M.D., and, accordingly, Respondent is hereby immediately prohibited from practicing medicine in the State of California pending further order from the Office of Administrative Hearings. Any motion to vacate this Interim Order of Suspension shall be filed in accordance with the provisions of Title 1, California Code of Regulations, sections 1006 and 1022. However, no such motion may be heard on an *ex parte* basis and any motion to vacate this Interim Order of Suspension shall be served on Petitioner's counsel and filed with the Office of Administrative Hearings no less than thirty (30) business days prior to any hearing on the motion. Once served and filed, no such motion shall be decided without first affording the parties the opportunity to present oral argument.

IT IS SO ORDERED this 14 day of October, 2022.



ADMINISTRATIVE LAW JUDGE
ADAM L. BERG
OFFICE OF ADMINISTRATIVE
HEARINGS